

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ROBERT WILSON and ERIC McNEAL,
individually and on behalf of all similarly
situated individuals,

Plaintiffs,

v.

MAXIM HEALTHCARE SERVICES, INC.,
a Maryland corporation,

Defendant.

No. 2:14-cv-00789-RSL

**STIPULATED MOTION FOR
DISMISSAL AND [PROPOSED]
ORDER**

NOTE ON MOTION CALENDAR:
August 7, 2017

STIPULATED MOTION FOR DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and Local Rule 10(g), Defendant Maxim Healthcare Services, Inc., together with Plaintiffs Robert Wilson and Eric McNeal (collectively, the “Parties”), by and through the undersigned counsel, respectfully move the Court to enter the stipulated Order as set forth below.

STIPULATION

The Parties hereby stipulate to the voluntary dismissal of the action in its entirety, *with prejudice*, as to the remaining three Opt-in Plaintiffs: **Taysir Yamin, Paulette Jackson, and Michael Crother**. Mr. Yamin’s and Ms. Jackson’s dismissals are warranted because they have

resolved their claims through individual settlement agreements with Defendant. Mr. Crother is deceased and his family members have informed Plaintiffs' counsel in writing that they will not pursue a letter of authority to effectuate his settlement agreement. As such, his dismissal is warranted, too.

With these dismissals, all remaining claims in this action have now been dismissed and, as such, the matter may be closed.

SO STIPULATED:

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DECLARATION OF SERVICE

I, Jesse L. Young, hereby declare under penalty of perjury under the laws of the United States that on this 7th day of August, 2017, I caused the foregoing document to be filed with the Clerk of the Court using the CM/ECF system which sent a Notice of Electronic Filing to the following persons:

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5 Clemens H Barnes 6 Daniel J. Oates 7 MILLER NASH GRAHAM & DUNN LLP 8 (SEA) 9 2801 Alaskan Way Suite 300 Pier 70 Seattle, WA 98121-1128 Email: clem.barnes@millernash.com Email: dan.oates@millernash.com	___ U.S. Mail, Postage Prepaid ___ Hand Delivered ___ Overnight Mail ___ Facsimile Transmission <u>X</u> Electronic Transmission

DATED this 7th day of August, 2017, in Seattle, Washington.

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ORDER

IT IS SO ORDERED.

Dated this _____ day of _____, 2017.

The Honorable Robert S. Lasnik
United States District Judge